

# SULLIVAN & CROMWELL LLP

TELEPHONE: 1-212-558-4000  
FACSIMILE: 1-212-558-3588  
WWW.SULLCROM.COM

125 Broad Street  
New York, New York 10004-2498  
LOS ANGELES • PALO ALTO • WASHINGTON, D.C.  
BRUSSELS • FRANKFURT • LONDON • PARIS  
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March 19, 2025

Via ECF

Chief Judge Virginia M. Kendall  
United States District Court for the Northern District of Illinois  
Everett McKinley Dirksen United States Courthouse, Courtroom 2541  
219 South Dearborn Street  
Chicago, IL 60604

Re: Illinois Bankers Association v. Raoul, Case No. 1:24-cv-07307

Dear Chief Judge Kendall:

I write on behalf of the Bank Policy Institute, The Clearing House Association L.L.C., and the Consumer Bankers Association (together, “*Amici*”), who, on August 28, 2024, submitted a motion for leave to file an *amici curiae* brief in the above-captioned matter in support of Plaintiffs’ motion for a preliminary injunction. (See Dkt. No. 35.) On October 3, 2024, this Court granted *Amici* leave to file the brief. (See Dkt. No. 63.) As the brief explained, the Illinois Interchange Fee Prohibition Act is preempted by federal law and threatens to disturb the proper functioning of payment systems not only in Illinois but also across the country by setting a precedent encouraging other states—or even localities—to enact their own laws disrupting card payment systems.

*Amici* respectfully request that their previous submission be considered by the Court in conjunction with Plaintiffs’ pending motion for summary judgment (see Dkt. No. 123), as the arguments set forth in *Amici*’s previous submission are equally applicable at the summary judgment stage. Accordingly, *Amici* stand by their prior *amici curiae* brief and respectfully urge the Court to grant Plaintiffs’ motion for summary judgment.

Respectfully submitted,

/s/ Matthew A. Schwartz  
Matthew A. Schwartz

*Counsel for Amici Curiae Bank Policy Institute, The Clearing House Association L.L.C., and Consumer Bankers Association*

cc: All counsel of record